

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KLEIMAR, N.V.,

Plaintiff,

against

DALIAN DONGZHAN GROUP CO., LTD.
BENXI BEIYING IRON AND STEEL GROUP
IMPORT AND EXPORT CORP. LTD.,
BEIGANG HONG KONG LIMITED, and
BEITAI IRON & STEEL GROUP CO., LTD.,

Defendants.

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ECF CASE

16 CV 9486 (AJN) (DCF)

**ANSWER OF
GARNISHEE MACSTEEL
INTERNATIONAL
USA CORP. TO TWENTY
FIRST THROUGH
THIRTY FIFTH SERVED
WRIT OF
GARNISHMENT BY
KLEIMAR, N.V.**

TO THE MARSHALL OF THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK:

Pursuant to Rule B(3)(a) of the Supplemental Rules for Certain Admiralty and Maritime Claims

of the Federal Rules of Civil Procedure and in response to a certain Process of Maritime

Attachment and Garnishment in the above-captioned matter dated January 9, 2017, and served

upon Garnishee MACSTEEL INTERNATIONAL USA CORP. ("MACSTEEL") on or about

March 15, 2017 and March 16, 2017, March 17, 2017, March 20, 2017, March 21, 2017, March

22, 2017, March 23, 2017, March 24, 2017, March 27, 2017, March 28, 2017, March 29, 2017,

March 30, 2017, March 31, 2017, April 3, 2017 and April 4, 2017, respectively, Garnishee

MACSTEEL hereby states that on each such date of service, it was not indebted to the

Defendants DALIAN DONGZHAN GROUP CO., LTD., BENXI BEIYING IRON AND

STEEL GROUP, IMPORT AND EXPORT CORP. LTD., BEIGANG HONG KONG LIMITED,

or BEITAI IRON & STEEL GROUP CO., LTD (collectively, "Defendants"), and did not

otherwise have in its possession any property, tangible or intangible, including funds, assets,

cash, good, chattels, credits, effects, debts, owed by or owed to the Defendant(s) or monies to be

paid to discharge a debt owed to the Defendant(s), including monies being transferred by, to or for the benefit of the Defendant(s).

Dated: New York, New York
April 5, 2017

DLA PIPER LLP (US)

By: /s/ Neal Kronley
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Attorneys for Garnishee
Macsteel International USA Corp.

VERIFICATION

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

Margo Rosner Marks, being duly sworn, deposes and says as follows:

I am the Managing Director for Macsteel International USA Corp. ("Macsteel"). I have reviewed the contents of the foregoing ANSWER OF GARNISHEE MACSTEEL INTERNATIONAL USA CORP. TO TWENTY FIRST THROUGH THIRTY FIFTH SERVED WRIT OF GARNISHMENT BY KLEIMAR, N.V. in Docket No. 16 Civ. 09486(AJN) and know the contents thereof and that the same are true to Macsteel's files, and communications with relevant employees of the company.





Margo Rosner Marks

Sworn to before me on
April 5, 2017



Notary Public

CERTIFICATE OF SERVICE

I, Neal Kronley, hereby certify that on the 5 day of April, 2017, I caused the foregoing ANSWER OF GARNISHEE MACSTEEL INTERNATIONAL USA CORP. TO TWENTY FIRST THROUGH THIRTY FIFTH SERVED WRIT OF GARNISHMENT BY KLEIMAR, N.V. to be served by ECF upon:

Kevin J. Lennon, Esq.
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Counsel for Plaintiff

/s/ Neal Kronley

Neal F. Kronley